

**BEFORE THE
PHYSICAL THERAPY BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

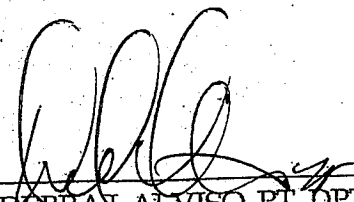
In the Matter of the Accusation/Petition)	Case #: 1D 2011 70907
To Revoke Probation Against:)	
Leenda LaConte)	OAH No. 2011110963
6844 Balcom Avenue)	
Reseda, California 91335)	
License No. PT 29164)	

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Physical Therapy Board, Department of Consumer Affairs, State of California, as its Decision in the above-entitled matter.

This decision shall become effective on July 4, 2012.

It is so ordered on June 4, 2012.



DEBRA J. ALVISO, PT, DPT, PRESIDENT
FOR THE PHYSICAL THERAPY BOARD
OF CALIFORNIA, DEPARTMENT OF
CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 GLORIA L. CASTRO
Supervising Deputy Attorney General
3 BENETH A. BROWNE
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4 State Bar No. 202679
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7 *Attorneys for Complainant*

8 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation/Petition to
12 Revoke Probation Against:

13 LEENDA LA CONTE
6844 Balcom Avenue
14 Reseda, California 91335

15 Physical Therapist License No. PT 29164

16 Respondent.

Case No. 1D 2011 70907

OAH No. 2011110963

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 PARTIES

21 1. Rebecca Marco (Complainant) is the Executive Officer of the Physical Therapy
22 Board of California. She brought this action solely in her official capacity and is represented in
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Beneth A.
24 Browne, Deputy Attorney General.

25 2. Leenda La Conte (Respondent) is representing herself in this proceeding and has
26 chosen not to exercise her right to be represented by counsel.

27 3. On or about February 11, 2004, the Physical Therapy Board of California issued
28 Physical Therapist License No. PT 29164 to Leenda La Conte. The Physical Therapist License

1 was in full force and effect at all times relevant to the charges brought in Accusation/Petition to
2 Revoke Probation No. 1D 2011 70907 and expired on October 31, 2011.

3 JURISDICTION

4 4. Accusation/Petition to Revoke Probation No. 1D 2011 70907 was filed before the
5 Physical Therapy Board of California (Board), Department of Consumer Affairs, and is currently
6 pending against Respondent. The Accusation/Petition to Revoke Probation and all other
7 statutorily required documents were properly served on Respondent on September 29, 2011.
8 Respondent timely filed her Notice of Defense contesting the Accusation/Petition to Revoke
9 Probation. A copy of Accusation/Petition to Revoke Probation No. 1D 2011 70907 is attached as
10 Exhibit A and incorporated by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, and understands the charges and allegations in
13 Accusation/Petition to Revoke Probation No. 1D 2011 70907. Respondent also has carefully
14 read, and understands the effects of this Stipulated Surrender of License and Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the right to a
16 hearing on the charges and allegations in the Accusation/Petition to Revoke Probation; the right
17 to be represented by counsel, at her own expense; the right to confront and cross-examine the
18 witnesses against her; the right to present evidence and to testify on her own behalf; the right to
19 the issuance of subpoenas to compel the attendance of witnesses and the production of
20 documents; the right to reconsideration and court review of an adverse decision; and all other
21 rights accorded by the California Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
23 every right set forth above.

24 CULPABILITY

25 8. Respondent admits the truth of each and every charge and allegation in
26 Accusation/Petition to Revoke Probation No. 1D 2011 70907, agrees that cause exists for
27 discipline and hereby surrenders her Physical Therapist License No. PT 29164 for the Board's
28 formal acceptance.

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Physical Therapist License without further process.

CONTINGENCY

10. This stipulation shall be subject to approval by the Physical Therapy Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Physical Therapy Board of California may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Physical Therapist License No. PT 29164, issued to Respondent Leenda La Conte, is surrendered and accepted by the Physical Therapy Board of California.

1. The surrender of Respondent's Physical Therapist License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Physical Therapy Board of California.

2. Respondent shall lose all rights and privileges as a Physical Therapist in California as of the effective date of the Board's Decision and Order.

1 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
2 issued, her wall certificate on or before the effective date of the Decision and Order.

3 4. If Respondent ever files an application for licensure or a petition for reinstatement in
4 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
5 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
6 effect at the time the petition is filed, and all of the charges and allegations contained in
7 Accusation/Petition to Revoke Probation No. 1D 2011 70907 shall be deemed to be true, correct
8 and admitted by Respondent when the Board determines whether to grant or deny the petition.

9 5. If Respondent should ever apply or reapply for a new license or certification, or
10 petition for reinstatement of a license, by any other health care licensing agency in the State of
11 California, all of the charges and allegations contained in Accusation/Petition to Revoke
12 Probation, No. 1D 2011 70907 shall be deemed to be true, correct, and admitted by Respondent
13 for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict
14 licensure.

15 6. If Respondent can prove participation and completion of a drug and alcohol treatment
16 program lasting at least one year, then good cause is shown and a petition for reinstatement may
17 be filed after two years pursuant to Business and Professions Code section 2661.7.


18 7. Respondent shall pay the Board its costs of investigation and enforcement in the
19 amount of \$2,000.00 prior to issuance of a new or reinstated license.

20 ACCEPTANCE

21 I have carefully read the Stipulated Surrender of License and Order. I understand the
22 stipulation and the effect it will have on my Physical Therapist License. I enter into this
23 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
24 be bound by the Decision and Order of the Physical Therapy Board of California.

25
26 DATED: _____

5/10/2012

27 
LEENDA LA CONTE
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Physical Therapy Board of California of the Department of Consumer Affairs.

Dated: May 10, 2012

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
GLORIA L. CASTRO
Supervising Deputy Attorney General

Beneth A Browne

BENETH A. BROWNE
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation/Petition to Revoke Probation No. 1D 2011 70907

1 KAMALA D. HARRIS
Attorney General of California
2 GLORIA L. CASTRO
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3 BENETH A. BROWNE
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Attorneys for Complainant

FILED
STATE OF CALIFORNIA
PHYSICAL THERAPY BOARD OF CALIFORNIA
SACRAMENTO, CA September 29, 2011
BY C. Sacramento ANALYST

7
8 BEFORE THE
9 PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

10 In the Matter of the Petition to Revoke
11 Probation Against,

Case No. 1D 2011 70907

12 LEENDA LA CONTE, P.T.
6844 Balcom Avenue
13 Reseda, California 91335,

PETITION TO REVOKE PROBATION

14 Physical Therapist License No. PT 29164

15 Respondent.
16

17
18 Complainant alleges:

19 PARTIES

20 1. Rebecca Marco (Complainant) brings this Petition to Revoke Probation solely in her
21 official capacity as the Interim Executive Officer of the Physical Therapy Board of California,
22 Department of Consumer Affairs.

23 2. On or about February 11, 2004, the Physical Therapy Board of California issued
24 Physical Therapist License Number PT 29164 to Leenda La Conte (Respondent). The Physical
25 Therapist License was in effect at all times relevant to the charges brought herein and will expire
26 on October 31, 2011, unless renewed.
27
28

JURISDICTION

3. In a disciplinary action entitled *In the Matter of Accusation Against Leenda La Conte*, Case No. 1D 2009 67615, the Physical Therapy Board of California, issued a decision, effective July 25, 2011, in which Respondent's Physical Therapist License was revoked. However, the revocation was stayed and Respondent's Physical Therapist License was placed on probation for a period of four (4) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

4. This Petition to Revoke Probation is brought before the Physical Therapy Board of California (Board), Department of Consumer Affairs, under the authority of the decision attached as Exhibit A and following laws. All section references are to the Business and Professions Code unless otherwise indicated.

5. Section 2609 of the Code states: "The board shall issue, suspend, and revoke licenses and approvals to practice physical therapy as provided in this chapter."

6. Section 2666 of the Code states:

"(a) Criteria for acceptance into the diversion program shall include all of the following:

(1) The applicant shall be licensed as a physical therapist or approved as a physical therapist assistant by the board and shall be a resident of California.

(2) The applicant shall be found to abuse dangerous drugs or alcoholic beverages in a manner which may affect his or her ability to practice physical therapy safely or competently.

(3) The applicant shall have voluntarily requested admission to the program or shall be accepted into the program in accordance with terms and conditions resulting from a disciplinary action.

(4) The applicant shall agree to undertake any medical or psychiatric examination ordered to evaluate the applicant for participation in the program.

(5) The applicant shall cooperate with the program by providing medical information, disclosure authorizations, and releases of liability as may be necessary for participation in the program.

1 (6) The applicant shall agree in writing to cooperate with all elements of the treatment
2 program designed for him or her.

3 Any applicant may be denied participation in the program if the board, the program
4 manager, or a diversion evaluation committee determines that the applicant will not substantially
5 benefit from participation in the program or that the applicant's participation in the program
6 creates too great a risk to the public health, safety, or welfare.

7 (b) A participant may be terminated from the program for any of the following reasons:

8 (1) The participant has successfully completed the treatment program.

9 (2) The participant has failed to comply with the treatment program designated for him or
10 her.

11 (3) The participant fails to meet any of the criteria set forth in subdivision (a) or (c).

12 (4) It is determined that the participant has not substantially benefited from participation in
13 the program or that his or her continued participation in the program creates too great a risk to the
14 public health, safety, or welfare. Whenever an applicant is denied participation in the program or
15 a participant is terminated from the program for any reason other than the successful completion
16 of the program, and it is determined that the continued practice of physical therapy by that
17 individual creates too great a risk to the public health, safety, and welfare, that fact shall be
18 reported to the executive officer of the board and all documents and information pertaining to and
19 supporting that conclusion shall be provided to the executive officer. The matter may be referred
20 for investigation and disciplinary action by the board. Each physical therapist or physical therapy
21 assistant who requests participation in a diversion program shall agree to cooperate with the
22 recovery program designed for him or her. Any failure to comply with that program may result in
23 termination of participation in the program.

24 The diversion evaluation committee shall inform each participant in the program of the
25 procedures followed in the program, of the rights and responsibilities of a physical therapist or
26 physical therapist assistant in the program, and the possible results of noncompliance with the
27 program.

1 (c) In addition to the criteria and causes set forth in subdivision (a), the board may set forth
2 in its regulations additional criteria for admission to the program or causes for termination from
3 the program."

4 7. Section 2667 of the Code states:

5 "All board and diversion evaluation committee records and records of proceedings and
6 participation of a physical therapist or physical therapy assistant in a program shall be
7 confidential and are not subject to discovery or subpoena."

8 8. Section 2669 of the Code states that participation in a diversion program shall not be
9 a defense to any disciplinary action which may be taken by the board. This section does not
10 preclude the board from commencing disciplinary action against a physical therapist or physical
11 therapist assistant who is terminated unsuccessfully from the program under this section. That
12 disciplinary action may not include as evidence any confidential information.

13 9. Section 2261.5 of the Code provides, in pertinent part, as follows::

14 "(a) In any order issued in resolution of a disciplinary proceeding before the board, the
15 board may request the administrative law judge to direct any licensee found guilty of
16 unprofessional conduct to pay to the board a sum not to exceed the actual and reasonable costs of
17 the investigation and prosecution of the case.

18 "..."

19 "(c) When the payment directed in an order for payment of costs is not made by the
20 licensee, the board may enforce the order of payment by bringing an action in any appropriate
21 court. This right of enforcement shall be in addition to any other rights the board may have as to
22 any licensee directed to pay costs."

23 "d) In any judicial action for the recovery of costs, proof of the board's decision shall be
24 conclusive proof of the validity of the order of payment and the terms for payment."

25 "..."

26 PROBATION TERMS AND CONDITIONS

27 10. Term and Condition 16 of Respondent's probation, attached as Exhibit A, states:

28 "Respondent shall comply with the Board's probation monitoring program."

1 11. Term and Condition 25 of Respondent's probation, attached as Exhibit A, states:

2 "If Respondent violates probation in any respect, the Board, after giving Respondent notice
3 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that
4 was stayed. If an accusation or petition to revoke probation is filed against Respondent during
5 probation, the Board shall have continuing jurisdiction until the matter is final, and the period of
6 probation shall be extended until the matter is final."

7 12. Term and Condition 11 of Respondent's probation, attached as Exhibit A, states:

8 "Within 15 days from the effective date of this decision, Respondent shall enroll and
9 participate in the Board's Diversion Program at Respondent's cost until the Diversion Program
10 determines that participation in the Diversion Program is no longer necessary. Failure to comply
11 with requirements of the Diversion Program, terminating the program without permission or
12 being expelled for cause shall constitute a violation of probation by Respondent and Respondent
13 shall be immediately suspended from the practice of physical therapy.

14 ..."

15 "Respondent shall comply with all components of the Diversion Program. This includes
16 the fact that the Board may receive reports on all aspects of Respondent's participation in the
17 Diversion Program. Respondent shall sign a release authorizing the Diversion Program to report
18 all aspects of the diversion program as requested by the Board or its designee.

19 ..."

20 "Failure to comply with any component of this condition as specified above is a violation of
21 probation."

22 CAUSE TO REVOKE PROBATION

23 (Violation of Probation Term and Condition 11)

24 13. Respondent's probation is subject to revocation because she failed to comply with
25 Probation Condition 11, referenced above. The facts and circumstances regarding this violation
26 are as follows:

27 A. On or about August 15, 2011, Respondent was noncompliant with, withdrew from
28 and was terminated from the Board's diversion program.

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Exhibit A

Decision and Order

Physical Therapy Board of California Case No. ID 2009 67615

BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

LEENDA LA CONTE, PT
6844 Balcom Avenue
Reseda, California 91335

Physical Therapist License number 29164,

Respondent.

Case No. 1D 2009 67615

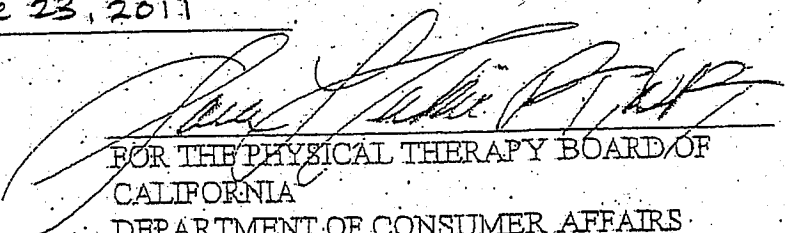
OAH No. 2010120047

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 25, 2011.

It is so ORDERED June 23, 2011


FOR THE PHYSICAL THERAPY BOARD OF
CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 ROBERT MCKIM BELL
Supervising Deputy Attorney General
3 RANDALL R. MURPHY
Deputy Attorney General
4 State Bar Number 165851
300 South Spring Street, Suite 1702
5 Los Angeles, California 90013
Telephone: (213) 897-2493
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Attorneys for Complainant

7
8 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 1D 2009 67615

11
12 LEENDA LA CONTE, PT
6844 Balcom Avenue
13 Reseda, California 91335

OAH No. 2010120047

14 Physical Therapist License
number 29164,

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15
16 Respondent.

17
18 In the interest of a prompt and speedy settlement of this matter, consistent with the public
19 interest and the responsibility of the Physical Therapy Board of California of the Department of
20 Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and
21 Disciplinary Order which will be submitted to the Board for approval and adoption as the final
22 disposition of the Accusation.

23 **PARTIES**

24 1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical Therapy
25 Board of California (Board). He brought this action solely in his official capacity and is
26 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
27 Randall R. Murphy, Deputy Attorney General:

28 ///

1 2. Respondent Leenda La Conte, Physical Therapist (Respondent) is represented in this
2 proceeding by attorney Mary E. Work, whose address is: 1334 Park View Avenue, Suite 100
3 Manhattan Beach, California, 90266.

4 3. On or about February 11, 2004, the Board issued Physical Therapist License number
5 29164 to Respondent. That license was in full force and effect at all times relevant to the charges
6 brought in Accusation number 1D 2009 67615 and will expire on October 31, 2011, unless
7 renewed.

8 JURISDICTION

9 4. Accusation number 1D 2009 67615 was filed before the Board, and is currently
10 pending against Respondent. The Accusation and all other statutorily required documents were
11 properly served on Respondent on July 23, 2010. Respondent timely filed her Notice of Defense
12 contesting the Accusation. A copy of Accusation number 1D 2009 67615 is attached as Exhibit
13 A and is incorporated herein by reference.

14 ADVISEMENT AND WAIVERS

15 5. Respondent has carefully read, fully discussed with counsel, and understands the
16 charges and allegations in Accusation number 1D 2009 67615. Respondent has also carefully
17 read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and
18 Disciplinary Order.

19 6. Respondent is fully aware of her legal rights in this matter, including the right to a
20 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
21 her own expense; the right to confront and cross-examine the witnesses against her; the right to
22 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
23 compel the attendance of witnesses and the production of documents; the right to reconsideration
24 and court review of an adverse decision; and all other rights accorded by the California
25 Administrative Procedure Act and other applicable laws.

26 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
27 every right set forth above.

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CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation number 1D 2009 67615.

9. Respondent agrees that her Physical Therapy License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physical Therapy License Number 29164 issued to Respondent Leenda La Conte, Physical Therapist (Respondent) is revoked. However, the revocation is stayed and Respondent is placed on probation for four (4) years on the following terms and conditions.

1. RESTRICTION OF PRACTICE - HOME CARE The Respondent shall not provide

1 physical therapy services in a patient's home.

2 Failure to comply with any component of this condition as specified above is a violation of
3 probation.

4 2. RESTRICTION OF PRACTICE - SOLO PRACTICE The Respondent shall be
5 prohibited from engaging in the solo practice of physical therapy.

6 3. RESTRICTION OF PRACTICE - PRESENCE OF ANOTHER PHYSICAL
7 THERAPIST REQUIRED

8 PHYSICAL THERAPISTS: The Respondent shall be prohibited from working any shift in
9 which there is no other physical therapist with an unrestricted license on duty.

10 4. RESTRICTION OF PRACTICE - PROHIBITION OF SELF EMPLOYMENT OR
11 OWNERSHIP Respondent shall not be the sole proprietor or partner in the ownership of any
12 business that offers physical therapy services. Respondent shall not be a Board member or an
13 officer or have a majority interest in any corporation that offers or provides physical therapy
14 services.

15 5. RESTRICTION OF PRACTICE - PROHIBITION OF DIRECT BILLING OF
16 THIRD-PARTY PAYERS Respondent shall not have final approval over any physical therapy
17 billings submitted to any third-party payers in any employment.

18 6. RESTRICTION OF PRACTICE - NO EMPLOYMENT OR SUPERVISION OF
19 PHYSICAL THERAPIST LICENSE APPLICANTS, PHYSICAL THERAPIST ASSISTANT
20 LICENSE APPLICANTS Respondent shall not supervise any physical therapist license
21 applicants, or physical therapist assistant applicants during the entire period of probation.
22 Respondent shall terminate any such supervisory relationship in existence on the effective date of
23 this probation.

24 7. RESTRICTION OF PRACTICE - ADMINISTRATION OR POSSESSION OF
25 CONTROLLED SUBSTANCES Respondent shall not administer or possess any controlled
26 substances as defined in the California Uniform Controlled Substances Act. This prohibition
27 does not apply to medications lawfully prescribed to Respondent for a bona fide illness or
28 condition by a practitioner licensed to prescribe such medications.

1 8. PROHIBITION OF POSSESSION OR USE OF CONTROLLED SUBSTANCES

2 Respondent shall abstain completely from the personal use or possession of controlled substances.
3 as defined by Section 4211 of the Business and Professions Code, or any drugs requiring a
4 prescription. This prohibition does not apply to medications lawfully prescribed to Respondent
5 for a bona fide illness or condition by a practitioner licensed to prescribe such medications.

6 Failure to comply with any component of this condition as specified above is a violation of
7 probation.

8 9. PROHIBITION OF THE USE OF ALCOHOL Respondent shall abstain completely
9 from the use of alcoholic beverages.

10 Failure to comply with any component of this condition as specified above is a violation of
11 probation.

12 10. BIOLOGICAL FLUID TESTING Respondent shall immediately submit to
13 biological fluid testing, at Respondent's cost, upon the request of the Board or its designee.

14 Failure to comply with any component of this condition as specified above is a violation of
15 probation.

16 11. DIVERSION PROGRAM Within 15 days from the effective date of this decision,
17 Respondent shall enroll and participate in the Board's Diversion Program at Respondent's cost
18 until the Diversion Program determines that participation in the Diversion Program is no longer
19 necessary. Failure to comply with requirements of the Diversion Program, terminating the
20 program without permission or being expelled for cause shall constitute a violation of probation
21 by Respondent and Respondent shall be immediately suspended from the practice of physical
22 therapy.

23 Respondent will not qualify to petition for termination of probation until the Board has
24 received written notice from the Diversion Program of Respondent's completion of the Diversion
25 Program, the probation will automatically be extended until the Board receives written notice for
26 the Diversion Program of Respondent's completion.

27 Respondent shall comply with all components of the Diversion Program. This includes
28 the fact that the Board may receive reports on all aspects of Respondent's participation in the

1 Diversion Program. Respondent shall sign a release authorizing the Diversion Program to report
2 all aspects of the diversion program as requested by the Board or its designee.

3 In the event the Board's diversion program is unavailable, Respondent shall participate in
4 a Diversion Program approved by the Board or its designee.

5 Failure to comply with any component of this condition as specified above is a violation
6 of probation.

7 12. OBEY ALL LAWS Respondent shall obey all federal, state and local laws, and
8 statutes and regulations governing the practice, inspections and reporting, of physical therapy in
9 California and remain in full compliance with any court ordered criminal probation.

10 13. COMPLIANCE WITH ORDERS OF A COURT The Respondent shall be in
11 compliance with any valid order of a court. Being found in contempt of any court order is a
12 violation of probation.

13 14. COMPLIANCE WITH CRIMINAL PROBATION AND PAYMENT OF
14 RESTITUTION Respondent shall not violate any terms and conditions of criminal probation
15 and shall be in compliance with any restitution ordered, payments or other orders.

16 15. QUARTERLY REPORTS Respondent shall submit quarterly declarations under
17 penalty of perjury on forms provided by the Board, stating whether there has been compliance
18 with all the conditions of probation.

19 16. PROBATION MONITORING PROGRAM COMPLIANCE Respondent shall
20 comply with the Board's probation monitoring program.

21 17. INTERVIEW WITH THE BOARD OR ITS DESIGNEE Respondent shall appear in
22 person for interviews with the Board, or its designee, upon request at various intervals.

23 18. NOTIFICATION OF PROBATIONER STATUS TO EMPLOYERS The
24 Respondent shall notify all present or future employers of the reason for and the terms and
25 conditions of the probation by providing a copy of the Initial Probationary License, Statement of
26 Issues, Accusation and the Decision and Order, or Stipulated Settlement to the employer, and
27 submit written employer confirmation of receipt to the Board within 10 days. The notification(s)
28 shall include the name, address and phone number of the employer, and, if different, the name,

1 address and phone number of the work location.

2 19. NOTIFICATION OF CHANGE OF NAME OR ADDRESS The Respondent shall
3 notify the Board, in writing, of any and all name and/or address changes within ten (10) days.

4 20. RESTRICTION OF PRACTICE - TEMPORARY SERVICES AGENCIES The
5 applicant's work for a temporary services agency or registry shall be limited as follows:

6 a. Applicant shall be limited to work for one (1) temporary service agency or
7 registry;

8 b. This work must be approved by the probation monitor;

9 c. Applicant must disclose this disciplinary proceeding as described above in
10 Condition 18, to the temporary service agency or registry;

11 d. Applicant must disclose this disciplinary proceeding, as described above in
12 Condition 18, to the supervisor at the facility where physical therapy care is being
13 performed.

14 Applicant must notify his/her probation monitor or Board's designee, in writing, of any
15 change in registry or temporary service. The Applicant must have written approval by the
16 probation monitor prior to commencing work at a new registry or temporary service agency.

17 21. RESTRICTION OF PRACTICE - CLINICAL INSTRUCTOR OF PHYSICAL
18 THERAPY STUDENT INTERNS OR FOREIGN EDUCATED PHYSICAL THERAPIST
19 LICENSE APPLICANTS PROHIBITED Respondent shall not supervise any physical therapy
20 student interns or foreign educated physical therapist license applicants during the entire period of
21 probation. Respondent shall terminate any such supervisory relationship in existence on the
22 effective date of this probation.

23 22. PROHIBITED USE OF ALIASES Respondent may not use aliases and shall be
24 prohibited from using any name which is not her legally-recognized name or based upon a legal
25 change of name.

26 23. INTERMITTENT WORK If the Respondent works less than 192 hours as a physical
27 therapist or a physical therapist assistant in the physical therapy profession in a period of three
28 months, those months shall not be counted toward satisfaction of the probationary period. The

1 Respondent shall notify the Board if she works less than 192 hours in a three month period.

2 24. TOLLING OF PROBATION The period of probation shall run only during the time
3 Respondent is practicing or performing physical therapy within California. If, during probation,
4 Respondent does not practice or perform within California, Respondent is required to
5 immediately notify the probation monitor in writing of the date that Respondent is practicing or
6 performing physical therapy out of state, and the date of return, if any. Practicing or performing
7 physical therapy by the respondent in California prior to notification to the Board of the
8 Respondent's return will not be credited toward completion of probation.

9 25. VIOLATION OF PROBATION If Respondent violates probation in any respect, the
10 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
11 carry out the disciplinary order that was stayed. If an accusation or petition to revoke probation is
12 filed against Respondent during probation, the Board shall have continuing jurisdiction until the
13 matter is final, and the period of probation shall be extended until the matter is final.

14 26. REQUEST TO SURRENDER LICENSE DUE TO RETIREMENT, HEALTH OR
15 OTHER REASONS Following the effective date of this probation, if Respondent ceases
16 practicing or performing physical therapy due to retirement, health or other reasons or is
17 otherwise unable to satisfy the terms and conditions of probation, Respondent may request to
18 surrender her license to the Board. The Board reserves the right to evaluate the Respondent's
19 request and to exercise its discretion whether to grant the request or to take any other action
20 deemed appropriate and reasonable under the circumstances. Upon formal acceptance of the
21 tendered license, the terms and conditions of probation shall be tolled until such time as the
22 license is no longer renewable, the Respondent makes application for the renewal of the tendered
23 license or makes application for a new license.

24 27. COMPLETION OF PROBATION Upon successful completion of probation,
25 Respondent's license shall be fully restored.

26 28. CALIFORNIA LAW EXAMINATION - WRITTEN EXAM ON THE LAWS AND
27 REGULATIONS GOVERNING THE PRACTICE OR PERFORMANCE OF PHYSICAL
28 THERAPY Within 90 days of the effective date of this decision, Respondent shall take and pass

1 the Board's written examination on the laws and regulations governing the practice of physical
2 therapy in California. If Respondent fails to pass the examination, Respondent shall be
3 suspended from the practice of physical therapy until a repeat examination has been successfully
4 passed.

5 29. PRACTICE OR PERFORMANCE OF PHYSICAL THERAPY WHILE ON

6 PROBATION It is not contrary to the public interest for the Respondent to practice and/or
7 perform physical therapy under the probationary conditions specified in the disciplinary order.

8 Accordingly, it is not the intent of the Board that this order, the fact that the Respondent has been
9 disciplined, or that the Respondent is on probation, shall be used as the sole basis for any third
10 party payer to remove Respondent from any list of approved providers.

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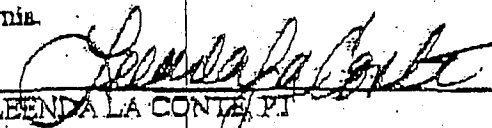
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ACCEPTANCE

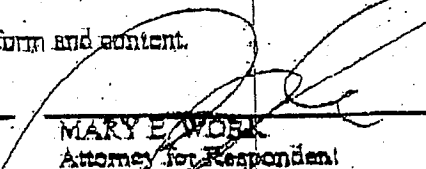
I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Mary E. Work. I understand the stipulation and the effect it will have on my Physical Therapy license. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Physical Therapy Board of California.

DATED: 5/27/2011


LEENDA LA CONTE, PT
Respondent

I have read and fully discussed with Respondent Leenda La Conte, Physical Therapy the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 5/27/11


MARY E. WORK
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physical Therapy Board of California of the Department of Consumer Affairs.

Dated: May __, 2011.

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ROBERT MCKIMBELL
Supervising Deputy Attorney General

RANDALL R. MURPHY
Deputy Attorney General
Attorneys for Complainant

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DATED:

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Exhibit A

Accusation No. 1D 2009 67615

1 EDMUND G. BROWN JR.
Attorney General of California
2 BENETH A. BROWNE
Deputy Attorney General
3 State Bar No. 202679
300 South Spring Street, Suite 1702
4 Los Angeles, California 90013
Telephone: (213) 897-7816
5 Facsimile: (213) 897-9395
Attorneys for Complainant

FILED
STATE OF CALIFORNIA
PHYSICAL THERAPY BOARD OF CALIFORNIA
SACRAMENTO, CA July 23, 2010
BY C. Guzman ANALYST

BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 1D 2009 67615

11 LEENDA LA CONTE, PT
12 6844 Balcon Avenue
13 Reseda, California 91335

ACCUSATION

14 Physical Therapist License No. 29164,

Respondent:

16
17 Complainant alleges:

18 PARTIES

19 1. Steven K. Hartzell (Complainant) brings this Accusation solely in his official capacity
20 as the Executive Officer of the Physical Therapy Board of California (Board).

21 2. On or about February 11, 2004, the Board issued Physical Therapist License number
22 29164 to Leenda La Conte (Respondent). The license was in full force and effect at all times
23 relevant to the charges brought herein and will expire on October 31, 2011, unless renewed.

24 JURISDICTION

25 3. This Accusation is brought before the Board under the authority of the following
26 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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1 4. Section 2602 of the Code states:

2 "The Physical Therapy Board of California, hereafter referred to as the board, shall enforce
3 and administer this chapter. . . ."

4 5. Section 2609 of the Code states:

5 "The board shall issue, suspend, and revoke licenses and approvals to practice physical
6 therapy as provided in this chapter."

7 6. Section 2660 of the Code states:

8 "The board may, after the conduct of appropriate proceedings under the Administrative
9 Procedure Act, suspend for not more than 12 months, or revoke, or impose probationary
10 conditions upon any license, certificate, or approval issued under this chapter for unprofessional
11 conduct that includes, but is not limited to, one or any combination of the following causes:

12
13 "(d) Conviction of a crime that substantially relates to the qualifications, functions, or duties
14 of a physical therapist or physical therapist assistant. The record of conviction or a certified copy
15 thereof shall be conclusive evidence of that conviction.

16
17 "(h) Conviction of a violation of any of the provisions of this chapter or of the Medical
18 Practice Act, or violating, or attempting to violate, directly or indirectly, or assisting in or abetting
19 the violating of, or conspiring to violate any provision or term of this chapter or of the Medical
20 Practice Act.

21 "

22 7. Section 2239 of the Code states:

23 "(a) The use or prescribing for or administering to himself or herself, of any controlled
24 substance; or the use of any of the dangerous drugs specified in Section 4022, or of alcoholic
25 beverages, to the extent, or in such a manner as to be dangerous or injurious to the licensee, or to
26 any other person or to the public, or to the extent that such use impairs the ability of the licensee
27 to practice medicine safely or more than one misdemeanor or any felony involving the use,
28 consumption, or self-administration of any of the substances referred to in this section, or any

1 combination thereof, constitutes unprofessional conduct. The record of the conviction is
2 conclusive evidence of such unprofessional conduct.

3 (b) A plea or verdict of guilty or a conviction following a plea of nolo contendere is deemed
4 to be a conviction within the meaning of this section. . . ."

5 8. Section 2661.5 of the Code states:

6 "(a) In any order issued in resolution of a disciplinary proceeding before the board, the
7 board may request the administrative law judge to direct any licensee found guilty of
8 unprofessional conduct to pay to the board a sum not to exceed the actual and reasonable costs of
9 the investigation and prosecution of the case.

10
11 "(d) In any judicial action for the recovery of costs, proof of the board's decision shall be
12 conclusive proof of the validity of the order of payment and the terms for payment.

13
14 9. Section 2661 of the Code states:

15 "A plea or verdict of guilty or a conviction following a plea of nolo contendere made to a
16 charge of a felony or of any offense which substantially relates to the qualifications, functions, or
17 duties of a physical therapist is deemed to be a conviction within the meaning of this article. The
18 board may order the license suspended or revoked, or may decline to issue a license, when the
19 time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when
20 an order granting probation is made suspending the imposition of sentence, irrespective of a
21 subsequent order under Section 1203.4 of the Penal Code allowing that person to withdraw his or
22 her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or
23 dismissing the accusation, information, or indictment."

24 10. Section 2666 of the Code states:

25 "(a) Criteria for acceptance into the diversion program shall include all of the following:

26 "(1) The applicant shall be licensed as a physical therapist or approved as a physical
27 therapist assistant by the board and shall be a resident of California.

1 "(2) The applicant shall be found to abuse dangerous drugs or alcoholic beverages in a
2 manner which may affect his or her ability to practice physical therapy safely or competently.

3 "(3) The applicant shall have voluntarily requested admission to the program or shall be
4 accepted into the program in accordance with terms and conditions resulting from a disciplinary
5 action.

6 "(4) The applicant shall agree to undertake any medical or psychiatric examination ordered
7 to evaluate the applicant for participation in the program.

8 "(5) The applicant shall cooperate with the program by providing medical information,
9 disclosure authorizations, and releases of liability as may be necessary for participation in the
10 program.

11 "(6) The applicant shall agree in writing to cooperate with all elements of the treatment
12 program designed for him or her. Any applicant may be denied participation in the program if the
13 board, its designee, or a diversion evaluation committee, as the case may be, determines that the
14 applicant will not substantially benefit from participation in the program or that the applicant's
15 participation in the program creates too great a risk to the public health, safety, or welfare.

16 "(b) A participant may be terminated from the program for any of the following reasons:

17 "(1) The participant has successfully completed the treatment program.

18 "(2) The participant has failed to comply with the treatment program designated for him or
19 her.

20 "(3) The participant fails to meet any of the criteria set forth in subdivision (a) or (c).

21 "(4) It is determined that the participant has not substantially benefitted from participation
22 in the program or that his or her continued participation in the program creates too great a risk to
23 the public health, safety, or welfare. Whenever an applicant is denied participation in the
24 program or a participant is terminated from the program for any reason other than successful
25 completion of the program, and it is determined that the continued practice of physical therapy by
26 that individual creates too great a risk to the public health, safety, and welfare, that fact shall be
27 reported to the executive officer of the board and all documents and information pertaining to and
28 supporting that conclusion shall be provided to the executive officer. The matter may be referred

1 for investigation and disciplinary action by the board. Each physical therapist or physical therapy
2 assistant who requests participation in a diversion program shall agree to cooperate with the
3 recovery program designed for him or her. Any failure to comply with that program may result in
4 termination of participation in the program. The diversion evaluation committee shall inform
5 each participant in the program of the procedures followed in the program, of the rights and
6 responsibilities of a physical therapist or physical therapy assistant in the program, and the
7 possible results of noncompliance with the program.

8 "(c) In addition to the criteria and causes set forth in subdivision (a), the board may set
9 forth in its regulations additional criteria for admission to the program or causes for termination
10 from the program."

11 11. Section 2667 of the Code states:

12 "All board and diversion evaluation committee records and records of proceedings and
13 participation of a physical therapist or physical therapy assistant in a program shall be
14 confidential and are not subject to discovery or subpoena."

15 12. Section 2669 of the Code states that participation in a diversion program shall not be
16 a defense to any disciplinary action which may be taken by the board. This section does not
17 preclude the board from commencing disciplinary action against a physical therapist or physical
18 therapist assistant who is terminated unsuccessfully from the program under this section. That
19 disciplinary action may not include as evidence any confidential information.

20 13. California Code of Regulations, title 16, section 1399.20, states:

21 "For the purposes of denial, suspension or revocation of a license, pursuant to Division 1.5
22 (commencing with Section 475) of the code, a crime or act shall be considered to be substantially
23 related to the qualifications, functions or duties of a person holding a license under the Physical
24 Therapy Practice Act if to a substantial degree it evidences present or potential unfitness of a
25 person to perform the functions authorized by the license or approval in a manner consistent with
26 the public health, safety or welfare. Such crimes or acts shall include but not be limited to the
27 following:
28

1 "(a) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
2 violation of, or conspiring to violate any provision or term of the Physical Therapy Practice Act.

3 "(b) Conviction of a crime involving fiscal dishonesty arising out of or in connection with
4 the practice of physical therapy.

5 "(c) Violating or attempting to violate any provision or term of the Medical Practice Act."

6 14. Section 125.3 of the Code provides, in pertinent part, that the
7 Board/Registrar/Director may request the administrative law judge to direct a licensee found to
8 have committed a violation or violations of the licensing act to pay a sum not to exceed the
9 reasonable costs of the investigation and enforcement of the case.

10 15. Section 482 of the Code states:

11 "Each board under the provisions of this code shall develop criteria to evaluate the
12 rehabilitation of a person when:

13 "(a) Considering the denial of a license by the board under Section 480; or

14 "(b) Considering suspension or revocation of a license under Section 490.

15 "Each board shall take into account all competent evidence of rehabilitation furnished by
16 the applicant or licensee."

17 16. Section 490 of the Code provides, in pertinent part, that a board may suspend or
18 revoke a license on the ground that the licensee has been convicted of a crime substantially
19 related to the qualifications, functions, or duties of the business or profession for which the
20 license was issued.

21 17. California Code of Regulations, Title 16, section 1399.22 states:

22 "When considering the suspension or revocation of a license on the ground that a person
23 holding a license under the Physical Therapy Practice Act has been convicted of a crime, the
24 board in evaluating the rehabilitation of such person and his or her eligibility for a license shall
25 consider the following criteria:

26 (a) The nature and severity of the act(s) or offense(s).

27 (b) The total criminal record.

28 (c) The time that has elapsed since commission of the act(s) or offense(s).

1 (d) Whether the licensee has complied with any terms of parole, probation, restitution or
2 any other sanctions lawfully imposed against such person.

3 (e) If applicable, evidence of expungement proceedings pursuant to Section 1203.4 of the
4 Penal Code.

5 (f) Evidence, if any, of rehabilitation submitted by the licensee."

6 18. Section 493 of the Code states:

7 "Notwithstanding any other provision of law, in a proceeding conducted by a board within
8 the department pursuant to law to deny an application for a license or to suspend or revoke a
9 license or otherwise take disciplinary action against a person who holds a license, upon the
10 ground that the applicant or the licensee has been convicted of a crime substantially related to the
11 qualifications, functions, and duties of the licensee in question, the record of conviction of the
12 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,
13 and the board may inquire into the circumstances surrounding the commission of the crime in
14 order to fix the degree of discipline or to determine if the conviction is substantially related to the
15 qualifications, functions, and duties of the licensee in question.

16 "As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and
17 'registration.'"

18 FIRST CAUSE FOR DISCIPLINE

19 *(2003 Conviction for Driving Under the Influence)*

20 19. Respondent is subject to disciplinary action under sections 2660, subdivision (d) and
21 490 in that she was convicted of a crime substantially related to the practice of physical therapy,
22 to wit, driving while having a blood-alcohol content exceeding 0.08 percent, in violation of
23 California Vehicle Code section 23152, subd. (b), a misdemeanor. She was convicted in a
24 criminal proceeding entitled *People of the State of California v. Leenda Maria La Conte* in Los
25 Angeles Superior Court, Case Number 3VN02757, Respondent was convicted on or around
26 August 13, 2003.

27 20. Pursuant to a plea agreement, Respondent's sentence was suspended. She was placed
28 on summary probation for a period of thirty-six months (three years) with various terms and

1 conditions, including completing a three month licensed first-offender alcohol and drug education
2 and counseling program, paying fines and restitution, completing a Hospital and Morgue program
3 and an essay, and, for ninety days, restricting her driving to going to and from work and/or
4 program.

5 21. Respondent's 2003 conviction was based on her driving on or around June 28, 2003.
6 She was driving home from a friend's house with a blood alcohol content of 0.17 percent at 85
7 miles per hour.

8 SECOND CAUSE FOR DISCIPLINE

9 *(2009 Conviction for Driving Under the Influence)*

10 22. Respondent is subject to disciplinary action under sections 2660, subdivision (d) and
11 490 in that she was convicted of a crime substantially related to the practice of physical therapy;
12 to wit, violation of California Vehicle Code section 23152, subd. (a), a misdemeanor. On or
13 around July 17, 2009, in proceedings entitled *People vs. Leenda Maria Laconte*, in Ventura
14 County Superior Court, Case Number 2008031185MA, Respondent was convicted of violating
15 Vehicle Code section 23152(a), driving under the influence of alcohol or drugs. The Court also
16 found true the enhancements of: (1) driving with a blood alcohol content of 0.20 percent or more,
17 and (2) driving with a blood alcohol content of .15 or more.

18 23. Based on a plea agreement, imposition of sentence was suspended and Respondent
19 was placed on formal probation for sixty months (five years) of formal probation. Terms of the
20 probation include: reporting to and being under the supervision of a probation officer;
21 maintaining regular employment as approved by the probation officer; not leaving her county of
22 residence for over seventy-two hours or changing her residence without reporting to her probation
23 officer; not leaving the state of California without permission from her probation officer;
24 participating in treatment program designated by her probation officer; not drinking or possessing
25 any alcoholic beverages; not being where alcohol is the chief item of sale; submitting to complete
26 tests of her breath, blood, urine when requested to by a peace officer or probation officer;
27 reporting immediately to the "Drinking Driver Program (Multiple Conviction Program -
28 previously SB 38)"; consenting to a search of her person, residence, vehicle, business or any

1 personal or real property under her control for alcoholic beverages by a probation officer or law
2 enforcement officer; not driving or owning any motor vehicle unless it is equipped with a
3 certified, calibrated and functioning ignition interlock device; not driving any vehicle until
4 obtaining a valid license; paying numerous fines, penalties and restitution; serving thirty days in
5 the Ventura County Jail.

6 24. The circumstances of the 2009 conviction are alleged to be that on or about June 21,
7 2008, Respondent was at a friend's house. She drank a lot of wine and some vodka. In the
8 morning hours of June 22, 2008, she drove her vehicle while having a blood alcohol content
9 exceeding 0.20 percent. She drove through a canyon and caused a car accident. Her vehicle
10 landed upside down. She was pulled from her vehicle's window and taken to the hospital. She
11 required a spinal fusion of five vertebrae.

12 THIRD CAUSE FOR DISCIPLINE

13 *(Bus. & Prof. Code section 2239(a): Conviction of More Than One Misdemeanor)*

14 25. Respondent is further subject to disciplinary action under sections section 2239,
15 subdivision (a) for having been convicted of more than one misdemeanor involving the use,
16 consumption of alcoholic beverages, as set forth in the First and Second Causes for Discipline.

17 FOURTH CAUSE FOR DISCIPLINE

18 *(Bus. & Prof. Code section 2239: Excessive Use of Drugs/Alcohol in 2003 and 2008)*

19 26. Respondent is further subject to disciplinary action under sections section 2660,
20 subdivision (h) in that she violated section 2239 by using alcoholic beverages to the extent, or in
21 such a manner as to be dangerous or injurious to herself, any other person or the public, more
22 specifically by twice operating a motor vehicle on a public roadway while under the influence of
23 alcohol. The circumstances are as set forth in the First and Second Causes for Discipline.

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25 ///

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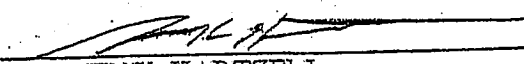
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Physical Therapy Board of California issue a decision:

1. Revoking or suspending PT Number 29164, issued Leenda La Conte.
2. Ordering her to pay the Board the reasonable costs of the investigation and enforcement of this case, and if placed on probation, the costs of monitoring.
3. Taking such other and further action as deemed necessary and proper.

DATED: July 23, 2010


STEVEN K. HARTZELL
Executive Officer
Physical Therapy Board of California
Department of Consumer Affairs
State of California
Complainant

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